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April 21, 1999

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 106
Rockville, MD 20852

RE: Docket #98N-1038, "Irradiation in the production, processing and handling of food"

As a parent, consumer and individual seeking a healthy lifestyle I strongly feel:

1. That irradiated foods should be clearly labeled and that the label should be permanent. The labeling should be stated in easily understood and plain verbiage that includes the words "irradiated" or "radiated food" as well as the radura logo. I also feel that the logo and labeling regarding irradiated state of foods should be more prominent than the declaration of ingredients.
2. This requirement of labeling should not expire at any time in the future.

Per the FDA request for personal comments I am addressing the following questions in my comments with my opinions in bold type:

- (1) Does the current radiation disclosure statement convey meaningful information to consumers in a truthful and non-misleading manner? **Yes**
- (2) How do consumers perceive the current radiation disclosure statement--as informational, as a warning, or as something else? **Informational**
- (3) Does the wording of the current radiation disclosure statement cause "inappropriate anxiety" among consumers? **No** What are examples of "inappropriate anxiety"?
- (4) What specific alternate wording for a radiation disclosure statement would convey meaningful information to consumers, in a truthful and non-misleading manner, and in a more accurate or less threatening way than the current wording? **As long as the wording states that the food has been or has ingredients that have been irradiated or radiation has been used, that is accurate and nonthreatening.**
- (5) Would consumers be misled by the absence of a radiation disclosure statement in the labeling of irradiated foods? **Yes** Are consumers misled by the presence of such a statement? **No**
- (6) With respect to foods containing irradiated ingredients, are consumers misled by the absence of a radiation disclosure statement? **Yes** Would consumers be misled by the presence of such a statement? **No**

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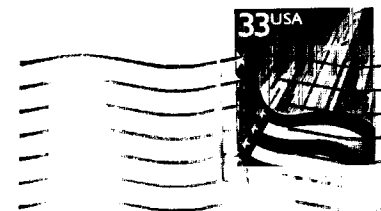
- (7) What is the level of direct consumer experience with irradiated foods that are labeled as such? **I have not noticed any labeling on foods. However, I have not looked for it before now. I do plan to look at all foods I purchase in the future for such labeling.**
- (8) What is the effect of the current required labeling on the use of irradiation? **I think the effect has been minimal because the public is not aware of irradiated foods being on the market.** Does the current required labeling discourage the use of irradiation? **No.**
- (9) What do consumers understand to be the effect of irradiation on food? **That irradiated foods have been altered from their natural state. The long term effects of consuming irradiated foods certainly leaves questions in my mind.** For example, what do consumers understand about the effect of irradiation on the numbers of harmful microorganisms in or on food? **Most consumers think irradiated food is safer than non-irradiated food. Most consumers do not seek natural, whole foods. I am not of this opinion. I feel more harm is done by consuming altered foods that is done by harmful microorganisms.**
- (10) Do consumers readily recognize the radura logo? **No**
- (11) Do consumers understand the logo to mean that a food has been irradiated? **No, it is not yet a recognizable symbol and therefore needs to be accompanied by the disclosure statement.**
- (12) Do consumers perceive the radura logo as informational, as a warning, or as something else? **I don't think they think anything about it because they do not recognize it yet.**
- (13) Should any requirement for a radiation disclosure statement expire at a specified date in the future? **No**
- (14) If so, on what criteria should the expiration be based?
- (15) If the expiration of labeling requirements for irradiated foods is to be based on consumer familiarity with the radura logo and understanding of its meaning, what evidence of familiarity and understanding would be sufficient to allow these requirements to expire? **The only measure of familiarity would be a survey. Why not just require the logo. It does not cost any more to include it with the disclosure statement and a government survey would cost millions no doubt.**

Sincerely,

A handwritten signature in cursive script that reads "Elaine Dutton".

Elaine Dutton

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